UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

CAMERON MCCADDEN, a minor, by his next friend, CHRYSTAL MCCADDEN,

Plaintiff,

Case No. 2:18-CV-12377 Hon. Denise Page Hood

v.

CITY OF FLINT; TIMOTHY JOHNSON, Chief of Police, City of Flint, in his official capacity; TERRANCE WALKER, in his individual capacity, and FLINT & GENESEE CHAMBER OF COMMERCE, a Michigan Non-profit corporation,

Defendants.

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SETTLEMENT AGREEMENT

PLEASE TAKE NOTICE that attached **Exhibit 1** is Plaintiff's Amended Settlement Distribution Record.

Respectfully submitted,

/s/ Jonathan R. Marko

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Dated: August 14, 2020

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2020, I presented the foregoing paper to this Court's ECF System which will send notification of such filing to the above listed attorneys of record.

/s/ Marissa A. Williams

EXHIBIT 1

McCadden v. Flint Settlement Disposition (Revised 8/12/20)

City of Flint: \$20,000.00 Chamber of Commerce: \$20,000.00

Total Settlement Funds: \$40,000.00

Litigation Costs

Fed Ex (ACLU-MI) \$32.71
U.S. Dist. Court (filing fee)(ACLU-MI) \$400.00
Independent Medical Exam (ACLU-MI) \$1,200.00
Expert consultant (Golden) (ACLU-MI) \$968.75
Postage (Marko) \$1.00
Copy costs (Marko) \$132.50
Mileage (Marko) \$80.50

Total Litigation Costs: \$2,815.46

Attorneys' Fees (20% after costs)

ACLU-MI Attorneys' Fees: \$6,186.91 Attorney's fee for special needs trust \$1,250.00

(Trust filing fee donated by ACLU National)

Total Costs and Fees: \$10,252.37

NET TO CLIENT: \$29,747.63